

ACTION: Interpretation of the term "otherwise changed" as that term is used in section 195.300

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DMT-14

This memo replies to your memo dated June 30, 1980, in which you request an interpretation of the term "otherwise changed," as that term is used in section 195.300.

Attachment

1980

No. 80-15  
Date: October 24,

DEPARTMENT OF TRANSPORTATION  
RESEARCH AND SPECIAL PROGRAMS ADMINISTRATION  
MATERIALS TRANSPORTATION BUREAU

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PIPELINE SAFETY REGULATORY INTERPRETATION

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te: A pipeline safety regulatory interpretation applies a particular rule to a particular set of facts and circumstances, and, as such, may be relied upon only by those persons to whom the interpretation is specifically addressed.

SECTION: 195.300

SUBJECT: Interpretation of the term "otherwise changed" as that term is used in section 195.300.

FACTS: As given in memorandum dated June 30, 1980, from Chief, Central Region, DMT-14, thru Associate Director for Operations and Enforcement, DMT-10, to Acting Associate Director for Pipeline Safety Regulation, DMT-30.

An existing bare pipeline is reconditioned in place by the following:

1. Uncovering
2. Cleaning (sandblasting and wire brush)
3. Repair by half sole or other acceptable procedure
4. Coat
5. Backfill

Question: Must the line be hydrostatically tested after reconditioning by virtue of being "otherwise changed."

Interpretation: Under section 195.300, an existing pipeline must be hydrostatically tested if it is replaced, relocated, or "otherwise changed." The purpose of the hydrostatic test is to assure the structural integrity of the replaced, relocated, or changed pipeline. Although a presumption is made that relocations and replacements by their very nature involve construction activities that would create doubt over the continued structural integrity of the pipeline, the same is not true for the variety of changes that

can be made to an existing line. Hence, if an existing line is changed in a manner that has the potential to compromise the structural integrity of the pipeline, a new hydrostatic test is required.

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